

## **Exhibit 15**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE

IN RE: VALSARTAN N-  
NITROSODIMETHYLAMINE (NDMA)  
CONTAMINATION PRODUCTS LIABILITY  
LITIGATION

Civil No. 19-2875 (RBK/JS)

ORDER

The Court having held a conference call with the parties on November 6, 2019; and this Order intending to confirm the Court's rulings; and for all the reasons stated by the Court on the record,

IT IS HEREBY ORDERED this 7<sup>th</sup> day of November, 2019, as follows:

1. The parties shall prepare separate Fact Sheets for the API and finished Dose Manufacturing defendants, the wholesaler, distributor and repackager defendants, and the pharmacy defendants. These Fact Sheets shall be finalized by the date of the January general status meeting, January 22, 2020.
2. To the extent not already done, by November 26, 2019, plaintiffs shall serve the foregoing defendants with Rule 34 document requests. Objections are to be served by December 17, 2019. Thereafter, the parties shall meet and confer concerning their disputes. Plaintiffs' discovery dispute letters regarding any disputes shall be served by January 13, 2020. Responses to be served by January 20, 2020. All discovery disputes will be addressed at the January 22, 2020 general status meeting.
3. By November 15, 2019, plaintiffs shall serve the API and finished dose manufacturing defendants with their up to date preliminary lists of ESI custodians and search terms.

4. To the extent not already done, by November 15, 2019, all API and finished dose manufacturing defendants shall complete their production of translated organization charts.
5. By November 18, 2019, all API and finished dose manufacturing defendants shall meet in person with representatives of plaintiffs regarding ESI discovery, custodian and search term issues. If the parties cannot agree on a place to meet, the meeting shall be held at the federal courthouse in Camden, New Jersey. The Court expects defense counsel to comply with their obligations under L.Civ.R. 26.1(d)(1). The Court expects plaintiffs' counsel to comply with their obligations under L.Civ.R. 26.1(d)(2).
6. All API and finished dose manufacturing defendants shall bring to the foregoing in-person meeting(s) the "person or persons with knowledge about the client's information management systems, including computer-based and other digital systems, with the ability to facilitate, through counsel, reasonably anticipated discovery." See L.Civ.R. 26.1(d)(1).

s/ Joel Schneider  
JOEL SCHNEIDER  
United States Magistrate Judge